



State of California—Health and Human Services Agency  
**Department of Health Services**



**ARNOLD SCHWARZENEGGER**  
Governor

May 5, 2005

TO: *Network* Project Coordinators

SUBJECT: *California Nutrition Network* Program Letter #05-01  
USDA FSNE Guidance Changes for FFY 2005 – 2006

Below is a list of changes from the 2005–2006 United States Department of Agriculture (USDA) Food Stamp Nutrition Education (FSNE) Plan Guidance. Since these changes will impact both current *California Nutrition Network for Healthy, Active Families* (*Network*) Local Incentive Awardees, special projects and future *Network* projects, we would like you to review the changes and identify areas that might impact the scope of work and activities in your current contract and/or your contract that is currently being negotiated. These changes apply to both local and state share activities and budgets. For those contractors that have contracts in place, the following guidelines will apply to those activities beginning October 1, 2005 and may necessitate changes in program requirements.

**1) Language Definitions for Target Population**

- i. **Certified Eligibles – Food Stamp Participants**  
Examples include persons referred by Food Stamp Program (FSP) office
- ii. **Likely Eligibles – Gross income at or below 130% of Federal Poverty Level (FPL)**  
Examples: Income eligibles referred by Women, Infants, and Children (WIC), MediCal, or Child Nutrition Programs (CNP).
- iii. **Potentially Eligible – Persons at venues serving generally low-income persons where at least 50% of persons have gross income at or below 185% of FPL.**  
Examples: Persons residing in census tract areas where 50% of persons have gross incomes that are equal to or less than 185% of FPL.

Children in schools where at least 50% of children receive free and reduced priced meals. For local projects targeting potentially eligibles, a waiver will be prepared by State staff and included in the CPNS USDA annual plan. (The waiver is not a new requirement).

- 2) **Staffing:** For each position title contributing to FSNE (e.g. charged to the FSNE Federal budget share *and* State budget share), in each project, staffing information should include a description of duties and the percentage of time spent on administrative activities and percentage of time spent on direct delivery of educational services.
- 3) **Pro-rating:** Local projects must pro-rate expenses for any activity (e.g. classroom education, media projects, etc.) they wish to conduct in which less than 50% of the target audience meets the 185% of FPL. In such instances, FSNE funds may be used to support only the budget percentage that reflects the proportion of the target audience at 130% FPL or less. This applies to both statewide activities and local-level projects. Note that funding for all surveillance/surveying activities must be pro-rated to reflect only the percentage of respondents at 130% FPL or less.
- 4) **University Students:** Local projects may not use FSNE funds to provide nutrition education to university students, unless the majority of students meet the 130% of FPL income guideline and at least one of the FSP eligibility criteria outlined on p. 68 of the 2006 USDA FSNE Plan Guidance. To access the Guidance, go to [http://www.nal.usda.gov/foodstamp/National\\_FSNE.html](http://www.nal.usda.gov/foodstamp/National_FSNE.html).
- 5) **Materials:** All newly developed or reprinted materials using FSNE funds must include a brief message about how the FSP can help provide a healthy diet and how to apply for benefits. The following message should be added to current attributions, "The Food Stamp Program provides nutrition assistance to people with low income. It can help you buy nutritious food for a better diet. To find out more, contact (insert local food stamp office contact number)." Spanish version: "El Programa de Cupones para Alimentos ofrece asistencia relacionada a la nutrición para gente con bajos ingresos. Le puede ayudar a comprar comida nutritiva para una mejor dieta. Para obtener más información, comuníquese con la oficina de servicios sociales de su condado."

As there are many existing appropriate nutrition education materials both for low-income consumers and intermediaries who provide services to the target

audience, we strongly encourage you to identify and use existing materials. However, we realize your local communities may require new products. All newly developed or reprinted materials using FSNE funds must be pre-approved by your *Network* Program Manager before use (this includes reprints of materials that were approved in prior years). Note that development of all new materials must be justified. We have attached the *Network* Educational/Promotional Materials Review Form and require at least five working days turnaround time for approval. Each nutrition education material developed/reprinted must be accompanied by this form. Local agency developed nutrition education materials that have not gone through the *Network* approval process may not be paid for with FSNE funds.

- 6) **2005 Dietary Guidelines for Americans:** Nutrition education messages which convey a negative message or disparage specific foods, beverages, or commodity, or which are not consistent with the 2005 Dietary Guidelines for Americans are not allowable.
- 7) **Memorandums of Understanding (MOUs), or Letters of Commitment:** Written agreements are needed for all collaborative activities. These agreements must be signed by a representative of each agency/organization participating in the collaboration. (See attached MOU).

Items below with \*, indicate changes which take effect as of the date of this letter. Please review your current project activities and identify any activities that are no longer allowable or that require adjustment. Work with your Program and Contract Managers to adjust your current contract scope of work, budget and budget justification. These changes are required to meet USDA funding requirements. The *Network* will not be requesting reimbursement for activities already completed prior to this notification.

- 8) **\*Travel:** Justification must be provided for all travel requests, stating how the travel will directly benefit FSNE clients. For *Network* sponsored trainings and events, travel will be fully reimbursed. For other trainings and events that are not *Network* sponsored, travel must be approved by your Program Manager and prorated based on percentage Full Time Equivalent of the employee. Travel outside the State of California requires prior written authorization from CPNS *Network* staff. No more than four Attendees using FSNE funding including *Network* staff, University of California, Cooperative Extension State and local agencies are allowed to travel for a particular out of state conference/training at a time. We request that you limit all out of state travel. We have attached an **Out of State Travel Approval form** that you should complete and submit to your

Program Manager for any trips you have planned including FNS, SNE, APHA etc... We need to determine the number of people requesting approval to attend any out of state conferences for this federal fiscal year. We will let you know if your request is approved or disapproved. **In addition, please complete and submit this form if you are requesting out of state travel for the upcoming federal fiscal year.**

- 9) **\*Restaurants:** Local projects providing FSNE services in partnership with restaurants may only use FSNE funds to do so in restaurants that are both authorized to accept food stamps and located in geographic areas meeting the FSNE targeting criteria.
- 10) **\*Substitute teachers:** Substitute Teacher costs for *Network* teachers while they are at *Network* or nutrition education trainings are not allowable costs. Also, paying stipends to teachers for attending trainings outside of classroom hours is unallowable. Use of substitutes is approved for teachers to attend trainings that are already scheduled and CPNS approved through the end of the school year (June 30, 2005). This includes the six Spring 2005 SHAPE meetings.
- 11) **\*Promotion vs. Outreach:** *Network* contractors are able to do Food Stamp promotion activities in their contract as part of nutrition education. However, Food Stamp outreach costs are not an allowable FSNE expenditures. Outreach expenditures for the following activities are not reimbursable through FSNE:
  - Implementing "Direct Certification" of FSP households for other USDA programs;
  - Outreach and recruitment for non-FSP USDA programs (e.g. School breakfast Program, National School Lunch Program or WIC);
  - Pre-screening or assisting clients with completing or submitting CNP or WIC applications and obtaining verification;
  - Producing materials that are for the primary or sole purpose of promoting CNP or WIC and distributing such materials as stand alone pieces;
  - Convening meetings/workshops that focus on increasing CNP or WIC participation;
  - Reimbursing the mileage for outreach training or meeting attendance;
  - Designing a CNP or WIC outreach project or building committees, teams etc. to do so;

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- Monitoring and evaluating local agencies' CNP or WIC outreach performance; Working on streamlining CNP or WIC application, implementation, or administrative procedures;
- Implementing environmental or systematic changes and strategies, in which the primary objective is to increase participation in a non-FSP program.

Enclosed is the 2005 - 2006 Allowable/Unallowable Chart which includes the changes highlighted above. This document should be used as guidance when preparing 2005 -2006 local and state share documents.

Since the FSNE Guidance changes are significant, we will be hosting a contractor teleconference at the end of May. All questions and comments on the guidance for this call will be pre-submitted. More details on this call are forthcoming.

We thank you for all your efforts and hard work on behalf of the citizens of California and look forward to working with you in the coming years.

Susan B. Foerster, M.P.H., R.D., Chief  
Cancer Prevention and Nutrition Section

Enclosures:

2005 – 2006 Allowable/Unallowable Chart

*Network* Out of State Travel Form

Education/Promotional Materials Review Form

Memo of Understanding